

EXHIBIT 4

From: [Droze, William M.](#)
To: [Gary Davis](#)
Cc: [Stacy Snow](#); [Jeff Friedman](#); [Andy Davis](#); [Lee Patterson](#); [West, Kadeisha A.](#); [Bailey, Matt](#)
Subject: RE: Parris v. Mount Vernon Mills, et al.
Date: Wednesday, October 26, 2022 3:44:27 PM
Attachments: [image001.png](#)

Good afternoon Gary. In regards to your inquiry about our objection, your complaint was filed on February 23, 2021. The longest statute of limitation applicable to your claims relates to the Clean Water Act which typically is viewed to have a five year lookback. Consequently, an appropriate temporal limitation is the time period within which a valid claim could be pursued; in this case February 23, 2016 (five years preceding the filing of your Complaint). Without waiver of our objection, but to avoid any question about the time period between the date upon which your 60 day notice letter expired (and any CWA claim ripened – Jan 20) and the filing of the suit, we opted to produce materials from January 1, 2016. There may be documents that precede that date in the production but that inadvertent production likewise was not intended as a waiver of our objection. Given that the touchstone of Rule 26 is relevance, we do not see any relevance of documents that could not be used to support an arguably valid claim in the litigation. Obviously this same rationale would apply to claims with even shorter limitations periods to the extent different documents could be claim-specific.

To be clear, our discovery response contemplated that we would identify documents withheld on privilege grounds, not documents that are not responsive, and we are in the process of finalizing and furnishing you with a privilege log. We further take issue with your characterization of current wastewater discharges, but as that is not the focus of your inquiry simply note our disagreement.

I am happy to discuss this with you further and have availability after 2:30p tomorrow or Friday. Thanks for reaching out and hope this further explanation is of use to you. Best, W

William M. Droze

Partner

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From: Gary Davis <gadavis@enviroattorney.com>
Sent: Tuesday, October 25, 2022 6:01 PM
To: Droze, William M. <william.droze@troutman.com>
Cc: Stacy Snow <ssnow@enviroattorney.com>; Jeff Friedman <jfriedman@friedman-lawyers.com>; Andy Davis <adavis@brinson-askew.com>; Lee Patterson <lpatterson@friedman-lawyers.com>
Subject: Parris v. Mount Vernon Mills, et al.

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